

DENNIS J. HERRERA, State Bar #139669
City Attorney
JOANNE HOEPER, State Bar #114961
Chief Trial Attorney
SEAN F. CONNOLLY, State Bar # 152235
Deputy City Attorney
Fox Plaza
1390 Market Street, 6th Floor
San Francisco, California 94102-5408
Telephone: (415) 554-3863
Facsimile: (415) 554-3837
E-Mail: sean.connolly@sfgov.org

Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO, ET AL.

BENJAMIN NISENBAUM, State Bar # 222173
LAW OFFICES OF JOHN L. BURRIS
Airport Corporate Centre
7677 Oakport Street, Suite 1120
Telephone: (510) 839-5200
Facsimile: (510) 839-3882

Attorneys for Plaintiff
ESTHER HWANG

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ESTHER HWANG,

Plaintiff,

vs.

CITY AND COUNTY OF SAN
FRANCISCO, ET AL.

Defendants.

Case No. C07-02718 MMC

**STIPULATION TO ENLARGE TIME
TO COMPLETE DISCOVERY;
~~[PROPOSED]~~ ORDER**

Whereas the parties have been continuing in good faith to complete discovery;
Whereas the parties have successfully completed a significant amount of necessary discovery;
Whereas the City has completed no fewer than eight depositions, and written discovery;
Whereas the parties have continued to meet and confer regarding any outstanding issues of
discovery;

Whereas certain impediments outside the parties control have prevented plaintiff from obtaining records essential to completing discovery and depositions of the defendant police officers;

Whereas certain impediments outside the parties control have prevented defendants from obtaining essential medical and psychiatric records of plaintiff, without which defendants cannot complete expert discovery;

Whereas the parties agree that receipt of these respective records is essential to completing both fact and expert discovery;

Whereas, the parties have met and conferred and agree that the deadline to complete factual discovery should be extended to until June 27, 2008;

Whereas the parties have met and conferred and agree that the deadline to make expert disclosures should be extended to July 25, 2008;

Whereas the parties have met and conferred and agree that the deadline to complete expert discovery should be extended to until October 10, 2008;

Whereas, this proposed modified discovery schedule will not change or upset the dates set by the court for jury trial in this matter.

IT IS SO STIPULATED BY THE PARTIES:

Dated: June 5, 2008

DENNIS J. HERRERA
City Attorney
SEAN F. CONNOLLY
Deputy City Attorney

By: s/Sean F. Connolly
SEAN F. CONNOLLY
Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO, et al.

Dated: June 5, 2008

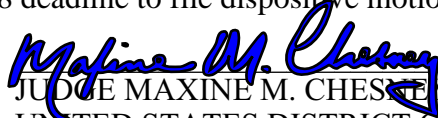
BENJAMIN NISENBAUM, ESQ.
JOHN BURRIS, ESQ.
Law Officers of John Burris

By: s/John Burris
JOHN BURRIS
Attorney for Plaintiff
ESTHER HWANG

PURSUANT TO STIPULATION,

IT IS SO ORDERED, with the exception that the expert discovery cutoff is continued to September 10, 2008. Further, the parties' stipulation shall not, by itself, constitute good cause to continue any other remaining date, including the July 25, 2008 deadline to file dispositive motions.

DATED: June 6, 2008


JUDGE MAXINE M. CHESLEY
UNITED STATES DISTRICT COURT